

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

*In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation*

**Master File No. 1:00 – 1898  
MDL 1358 (VSB)**

---

**This Document Relates to:**

*New Jersey Department of Environmental Protection, et al. v.  
Atlantic Richfield Co., et al.*, No. 1:08-CV-00312-VSB

---

**STIPULATION AND [PROPOSED] ORDER**

On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, newly-added Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants, Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until July 29, 2019 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: May 28, 2019

AGREED TO BY:

AKIN GUMP STRAUSS HAUER & FELD LLP

Katherine M. Katcher / AME  
KATHERINE M. KATCHEN  
Two Commerce Square  
2001 Market Street, Suite 4100  
Philadelphia, PA 19103  
(215) 965-1200  
*Counsel for Newly-Added Lukoil Defendants*

BLEAKLEY PLATT & SCHMIDT, LLP

Matthew G. Parisi / AME  
MATTHEW G. PARISI  
One North Lexington Avenue  
White Plains, NY 10601  
(914) 949-2700  
*Counsel for Lukoil Americas Corporation & Getty Petroleum Marketing Inc.*

MILLER & AXLINE, P.C.

Michael Axline / AME  
DUANE C. MILLER  
MICHAEL AXLINE  
1050 Fulton Ave., Suite 100  
Sacramento, CA 95825  
(916) 488-6688  
*Counsel for Plaintiff*

Gwen Farley / AME  
GWEN FARLEY  
Deputy Attorney General  
New Jersey Attorney General's Office  
Division of Law  
Environmental Enforcement & Environmental Justice Section  
25 Market Street, 7<sup>th</sup> floor  
Trenton, NJ 80625-0093

SO ORDERED,

Dated: \_\_\_\_\_, 2019

---

HON. VERNON S. BRODERICK